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September 24, 2013

The Honorable Steven M. Gold
United States Magistrate Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Hockenjos v. City of New York, Inc., et al.*, 13-CV-0027 (WFK)(SMG)

Dear Chief Magistrate Judge Gold:

My office represents the Plaintiffs. In response to an Order issued by Your Honor, I write in advance of our scheduled conference this coming Friday to advise that Plaintiffs will seek an order compelling proper discovery responses from the Defendant City of New York.

Last week, my office finally received what the City's attorneys claim is the entire file of the NYPD's Internal Affairs Bureau ("IAB") relating to the false arrest and imprisonment of Plaintiff John Hockenjos. While over 1100 pages were produced, there is little organization to the documents and entire (multiple) pages have been redacted with no explanation.

Most significantly, the City apparently believes that the production of the "IAB file" satisfies all of the document requests and interrogatories served by Plaintiffs. Clearly, it does not. Plaintiffs asked the City to respond to individual requests; the City has, however, failed to respond to Plaintiffs' individual document requests, and many things requested have not yet been produced.

I have already had a preliminary discussion with the City's attorneys on this subject and counsel plan to speak again before Friday's conference to reduce the discovery issues that otherwise might be brought before the Court.

Sincerely yours,

John F. Schutty

cc: Melissa Wachs, Esq. (VIA ECF)